

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CRAIG MEDOFF,

Defendant.

Crim. No. 24-10048-MLW

**GOVERNMENT’S WITNESS/EXHIBIT LIST**

In accordance with the Court’s order of April 30, 2024 (Dkt. No. 75), the government hereby submits the following list of witnesses it may call to testify as part of its case-in-chief at trial, along with the corresponding exhibits the government currently intends to introduce through each witness and an updated exhibit list. The government will provide the Court and the defendant with copies of its updated exhibit list and exhibits. The government reserves the right to supplement and/or modify this witness/exhibit list with notice to the defendant and the Court.<sup>1</sup>

	<b>Witness</b>	<b>Exhibit #s</b>
<b>1.</b>	LeeAnn Gaunt Chief of Public Finance Abuse Unit Securities and Exchange Commission (“SEC”) Boston Regional Office Boston, MA	1, 2, 5, 107-110
<b>2.</b>	Lane Campbell Boulevard Impact Group/Bedrock Impact Management Cleveland, OH	6, 7, 111-117
<b>3.</b>	Alex Nivorozhkin Adelia Therapeutics/Cybin Inc. Boston, MA	118-129

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<sup>1</sup> In particular, the government reserves the right to call “keeper of records” witnesses to the extent necessary for authentication/business records purposes, absent stipulations, as well as representatives of other clients of Nova Capital. In addition, the government reserves the right to call witnesses, including additional witnesses from the SEC, as part of a possible rebuttal case. In accordance with the Court’s pretrial order (Dkt. No. 44), if the government hereafter forms an intent to call any other witness, the government will promptly notify the defendant and the Court.

	<b>Witness</b>	<b>Exhibit #s</b>
<b>4.</b>	Yuan Huang Padgea Inc. Cambridge, MA	130-139
<b>5.</b>	Jenna Brown Financial Investigator United States Attorney's Office, District of Massachusetts Boston, MA	15, 24, 140-143

<b>Exhibit #</b>	<b>Exhibit Description<sup>2</sup></b>
<b>1</b>	Civil Complaint
<b>2</b>	Final Judgment
<b>5</b>	2017.09.07 Letter from SEC to Medoff
<b>6</b>	Nova Capital - Investment Banking
<b>7</b>	Nova Capital - Investment Bank
<b>15</b>	TD Bank Assessing Your New Business Account
<b>24</b>	Nova Capital Checks
<b>107</b>	06.15.16 Declaration of Craig Medoff
<b>108</b>	Consent to Judgment
<b>109</b>	Payment Report
<b>110</b>	Receivable Transaction Report
<b>111</b>	2019-02-25 Email
<b>112</b>	2021-07-29 Email Attachment (1)
<b>113</b>	2021-07-29 Email Attachment (2)
<b>114</b>	2021-07-29 Email
<b>115</b>	2021-11-01 Advisory Agreement (Bedrock Impact Management - Nova Capital)
<b>116</b>	2023-06-14 Text Message
<b>117</b>	LinkedIn Profile (Alexander Carlin)
<b>118</b>	Adelia Therapeutics - Investor Deck - 06 -10 -2020 - BJG revision
<b>119</b>	Copy of Nova Capital Account
<b>120</b>	Cybin Form 51-102F3 Material Change Report (12-7-2020) (EX-99.30)
<b>121</b>	Cybin Form 51-102F3 Material Change Report (12-14-2020) (EX-99.36)
<b>122</b>	Cybin Form 51-102F4 Business Acquisition Report (EX-4.6)
<b>123</b>	Cybin Press Release (12-7-2020) (EX-99.31)
<b>124</b>	Cybin Press Release (12-14-2020) (EX-99.32)
<b>125</b>	X_Adelia - A&R Investment Banking Agrmt - _Nova_Capital_FE

<sup>2</sup> The listed exhibits do not include statements made by the defendant or documents provided by the defendant in connection with the civil contempt proceedings in *Securities and Exchange Commission v. Biochemics, Inc. et al.*, 12-cv-12324. The government does not intend to use any such statements or documents in its case-in-chief at trial.

126	X_C.07 - Contribution Agreement
127	X_H.40 - Support Agreement
128	X_H.41.vi - Executed instruments of transfer from Contributors Company Shares (Nova Capital International)
129	X_K.56 - Final Form 10 - Notice of Acquisition
130	Final IB Agreement with Nova Capital
131	Padgea - Investor Deck - DRAFT - v34 - 10-01-2021 - SG05 - ACarlin
132	Padgea - Nova Capital - Invoice 103 - Additional IB Advisory Services - 05-14-2021 - FINAL \$7400
133	Padgea - Nova Capital - Invoice 102 - \$10000 - Completion of IB Advisory Services - 05-13-2021 - FINAL
134	Padgea - Nova Capital - Invoice 106 - Interim CFO Advisory - 09.01.2021 - FINAL
135	Padgea - Nova Capital - Invoice 107 - Additional IB Advisory Services - 09-02-2021 - FINAL
136	Padgea - Nova Capital - Invoice 108 - Additional IB Advisory Fees - 09-21-2021 - FINAL
137	Padgea - Nova Capital Invoice 110- Additional IB Advisory Services - 10.13.2021
138	Padgea SEC FORM D (10-14-2021)
139	PadsFinder- Investment Banking Advisory Agreement - Nova Capital - FINAL VII - 02-17-2021 - EXECUTED
140	Citibank 4212 - Wires (Craig Medoff)
141	TD Bank 2119 - Withdrawals (Craig Medoff)
142	Examples of Client Payments ( <i>summary chart</i> )
143	Inventory of Accounts ( <i>summary chart</i> )

Respectfully Submitted,

JOSHUA S. LEVY  
Acting United States Attorney

By: /s/ Leslie A. Wright  
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**Certificate of Service**

I hereby certify that this document was this day filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”).

Date: May 3, 2024

/s/ Leslie A. Wright  
LESLIE A. WRIGHT